

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MARK HOFFMAN, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

REAGAN GOLD GROUP, LLC

Defendant.

Case No. 3:24-cv-6003 TMC

DECLARATION OF MARY BOSTON
IN SUPPORT OF
MOTION TO SET ASIDE DEFAULT

I, Mary Boston, do hereby declare:

1. My name is Mary Boston and I am a current employee of Defendant Reagan Gold Group. I have personal knowledge of the following factual statements and if called upon to testify would do so on the basis of such personal knowledge.

2. I have been employed with Reagan Gold Group (“RGG”) as the CFO since April 9th, 2024. RGG hired me to expand their marketing efforts and grow the company. Prior to my arrival, RGG had a lead partner and long term relationship with Nick Munoz of Data Alliance Group. For over 2 years Data Alliance Group provided RGG with exclusive leads (leads not sold to any other gold companies) from individuals *who electronically consented* to receive a gold guide through SMS. RGG relied on these exclusive leads because we were reasonably assured that the prospective person *had provided electronic*

1 *consent*. Based upon this reliably consistent relationship with Data Alliance Group, we at all times
2 reasonably believed that we were in TCPA compliance.

3
4 3. Our customer relationship management system is Salesforce. It has inherent safeguards
5 for adhering to individual requests to no longer be contacted for all channels, including phone calls, SMS,
6 and email. Our sales team is trained early and often on how individuals can be opted out so there is no
7 further contact attempt based on their request. It is in a salesperson's best interest to comply with this
8 procedure because they don't want to waste time with someone who has zero interest in our products and
9 services.

10 4. When we were asked to no longer contact Mr. Hoffman, the plaintiff in this action, the
11 lead record was dispositioned accordingly and removed permanently from being contacted ever again. We
12 have recently learned that Data Alliance Group, the lead provider, is no longer in business.

13 5. Since joining RGG I have focused our Team on identifying high quality leads of
14 interested individuals who have given consent to be contacted. Unlike many other companies, we do not
15 purchase large lists to "cold call". We only seek out prospects who have displayed a genuine interest in
16 owning physical gold and silver.

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18 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
19 correct. Executed on April 22, 2025.

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23 Mary Boston
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